

In The Matter Of:
Valencia Colon v.
Richard Roundtree et al

Kimberly Lee
February 4, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

Valencia Colon,)
Plaintiff,)
v.) Civil Action File No.
Richard Roundtree, et al.,) 1:21-cv-00149-JRH-BKE
Defendants.)

The videotaped videoconference deposition of
KIMBERLY LEE, taken for purposes of discovery,
cross-examination, and all other purposes allowed
under the Civil Practice Act of Georgia; all
formalities waived; the reading and signing of the
deposition waived; before Jennifer A. Gerber, CCR
6241-2465-4151-2704, Certified Court Reporter, in
and for the State of Georgia; commencing at
2:00 p.m., February 4th, 2022, Augusta, Georgia.

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APPEARANCES (Remote)

ON BEHALF OF THE PLAINTIFF:

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ON BEHALF OF THE DEFENDANTS:

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ALSO IN ATTENDANCE:

ERIC GEORGE, VIDEOGRAPHER

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I N D E X

CROSS-EXAMINATION BY MR. CAUTHORN Page 5

E X H I B I T S

EXHIBIT NUMBER	DESCRIPTION	PAGE MARKED/ IDENTIFIED
C	Open Records Request Production for Charlie T. Walker	23/23
H	Open Records Request Response Letter March 2021	24/24
G	Open Records Request Response Letter March 2020	25/25
B	Online Articles March 2017	26/26
F	Online Articles April/May 2017	27/28
A	YouTube Video	30/30
D	Charlie T. Walker's Work Schedule June 2019	36/36
E	Approved Off Duty Requests Letter	36/36

TRANSCRIPT LEGEND

. . . (ellipsis)	Halting speech or an unfinished sentence in dialogue or an omission when reading written material
-- (dashes)	Break in speech continuity
(ph)	Spelled phonetically
(sic)	In its original form

P R O C E E D I N G S

2:00 p.m.

(Whereupon, the court reporter complied with the requirements of O.C.G.A. 9-11-28(c).)

THE VIDEOGRAPHER: This is the deposition of Sergeant Lee in the matter Colon versus Roundtree. Today's date is February 4th, 2022. The time is 2:00 p.m. and we are officially on the record.

THE COURT REPORTER: And, again, today's date is February 4th, 2022. The time is 2:01 p.m. This is the case of Colon versus Roundtree. At this time, can everyone please state their name and who they represent?

MR. CAUTHORN: My name is Wick Cauthorn. I represent the Plaintiff.

MR. FRAILS: Randy Frails on behalf of the Defendants. And Tameka Haynes on behalf of the Defendants.

THE WITNESS: I'm Sergeant Kimberly Lee. I am with the Richmond County Sheriff's Office.

THE COURT REPORTER: Thank you. My name is Jennifer Gerber. I'm the court reporter. We are all appearing via Zoom today. Do all parties agree to have the witness sworn remotely?

MR. CAUTHORN: Yes.

MS. HAYNES: Yes.

1 MR. FRAILS: Yes.

2 THE COURT REPORTER: Okay.

3 (Whereupon, the witness was sworn remotely by the court
4 reporter per agreement of counsel.)

5 Whereupon,

6 KIMBERLY LEE

7 Was called as a witness herein and, having been first duly
8 sworn, was deposed and testified as follows:

9 CROSS-EXAMINATION

10 BY MR. CAUTHORN:

11 Q Sergeant Lee, I -- I believe you and I have probably
12 communicated already. I believe you responded to several open
13 records requests that I sent to the sheriff's department, so I
14 appreciate the cooperation you've already given to us. So
15 thank you for being here this afternoon.

16 A You're welcome.

17 Q So you're here this afternoon because we communicated
18 with defense counsel about specific areas of knowledge that we
19 needed to depose people on, and they identified you as someone
20 who would be able to testify about the sheriff's department
21 internal affairs policy and investigations. Is that your
22 understanding about what you're here to testify about today?

23 A Yes.

24 Q Okay, good. Can you say your full name for the
25 record and spell it for the court reporter?

1 A Okay. My first name is Kimberly. That's
2 K-I-M-B-E-R-L-Y. My last name is Lee, L-E-E.

3 Q Do you have a middle name?

4 A Yes.

5 Q What's your middle name?

6 A That's Washonda, W-A-S-H-O-N-D-A.

7 Q Okay. What is your occupation?

8 A I am an investigator sergeant in the internal affairs
9 division.

10 Q Of the Augusta-Richmond County Sheriff's Department?

11 A Yes.

12 Q Okay. How long have you been in that position?

13 A Since March 27th, of 2018.

14 Q March 2018 or 2017, sorry?

15 A 2018.

16 Q Okay. And how long have you been with the Richmond
17 County Sheriff's Department?

18 A November the 9th, 2013.

19 Q All right. What was your position immediately prior
20 to the current position?

21 A I was a violent crimes investigator.

22 Q How long were you a violent crimes investigator?

23 A From the time I was hired until I was promoted to
24 internal affairs.

25 Q How long have you been in law enforcement?

1 A When I started with the Richmond County Sheriff's
2 Office in 2013.

3 Q Okay. What is your highest level of education?

4 A A bachelor's degree.

5 Q Where did you -- where did you get your degree from?

6 A The University of South Carolina in Aiken, South
7 Carolina.

8 Q When did you graduate?

9 A December of 2000.

10 Q All right. What did you do for a living between
11 the -- December 2000 and beginning with the sheriff's
12 department? And, you know -- and I know that's a broad
13 question, but just do your best. I'm just trying to get an
14 idea.

15 A Okay. When I -- after I graduated I received a job
16 with the Georgia Department of Corrections as a counselor. And
17 I did that -- I started that in 2001, and I stayed there for
18 about a year and a half. After that I worked at Therapeutic
19 Foster Care Agency as a family consultant, and I worked there
20 for about -- maybe two, three years. And then after that I
21 worked at the Child Advocacy Center as a forensic interviewer
22 for about six years. After that I worked -- I went back to
23 Therapeutic Foster Care as a recruiting licensing manager. And
24 then I started at the sheriff's office.

25 Q Okay. What is your training for your law enforcement

1 job?

2 A I'm POST certified, so I received my certification,
3 actually, in 2014. And then, you know, that training with
4 Georgia POST to get your initial -- and then after that, just
5 various types of training.

6 Q Okay. Based on your experience -- and I forgot to
7 ask you, I'm guessing your undergraduate degree was in
8 psychology or -- or social work?

9 A Psychology.

10 Q All right. And so part of your job with internal
11 affairs -- do you conduct investigations into policy violations
12 by employees of the sheriff's department?

13 A I do.

14 Q Okay. And do you -- did you -- does that include use
15 of force violations and things like that?

16 A Yes.

17 Q Okay. I wanna kind of have a -- go to the big
18 picture before we go to a small picture, so can you --

19 A Okay.

20 Q -- generally describe to me, you know, what prompts
21 you to get involved in investigation into a -- an employee's
22 conduct. And then how it proceeds, and then -- and -- and --
23 and who does it. So just kind of walk me through that process.

24 A Okay. Well, all of the internal affairs
25 investigations, they are -- the sheriff or the colonel or the

1 chief will let the internal affairs division know that there is
2 a case that they want us to investigate. And that usually goes
3 to our lieutenant and he will assign a case from there. And it
4 really depends on where the case is. So if there is a criminal
5 investigation that is also going on as well as an internal
6 affairs investigation, that criminal investigation goes first
7 before we get involved into the internal affairs investigation.

8 We also handle complaints too. So those we may look into,
9 but they usually go back to the -- the -- or the immediate
10 supervisor. But as far as the big investigations, those are --
11 we're told to do those by the sheriff.

12 Q Okay. And when you say you wait for the criminal
13 investigation, does not mean you wait until a criminal
14 investigation and prosecution is completely ended before you
15 begin the -- the --

16 A Well, it will depend. Every case is different. So
17 if there is a criminal investigation, it depends on where it
18 lands as far as statements given to law enforcement. If -- if
19 they're finished with that portion of it, we'll start our
20 investigation, or at least interviews. So everyone -- it just
21 depends where it is in that criminal investigation. So it
22 doesn't have to totally complete itself for us to get involved,
23 but it has to be at some point where the criminal investigator
24 is finished with their portion with that -- with that deputy.

25 Q Okay. The -- how is the -- is the internal affairs

1 investigation conducted? How -- how does the investigation
2 itself typically proceed?

3 A Well, after we receive notice that it's something
4 that we're going to investigate, like it's -- one of the three
5 investigators are assigned to that case. And we'll collect any
6 information that we'll need for our investigation. And usually
7 we'll interview the deputy that is involved.

8 Q Beyond the deputy involved, who else would you
9 interview?

10 A It would just depend, because we want to keep our
11 investigation separate from the criminal investigation. And
12 then what -- the information that we receive from them -- they
13 are under Garrity -- we don't share that information with law
14 enforcement. So it -- like I said, every -- I mean, yeah,
15 every one is kind of different. So it would just depend on the
16 allegation, who's available at the time, and what information
17 that we already have.

18 Q How was -- how are the -- how are interviews recorded
19 or -- and conducted? How do you do those?

20 A Those are done down here in the internal affairs
21 division, and they're usually done by audio recording.

22 Q Okay. Are -- are they ever -- are they ever not
23 recorded at all?

24 A There are some where they have not been recorded.

25 Q Okay. And what would be the reason for not recording

1 an interview?

2 A Like I -- it would just depend on the information
3 that we've already received. Sometimes we may receive a
4 written statement prior to the deputy coming down, so we will
5 review that. And if it has anything outside of what they've
6 already provided to us, that could be a reason why we didn't
7 record. But like I said, every one is different.

8 Q Okay. If it's not audio -- if an interview is not
9 audio recorded, how is it otherwise documented?

10 A Notes.

11 Q Okay. Who usually conducts the interviews?

12 A One of the three sergeants in internal affairs or our
13 lieutenant.

14 Q All right. Can you name all of those people for me?

15 A I can. Sergeant Caleb Lee, Sergeant William McCarty,
16 and Lieutenant Glen Rahn, R-A-H-N.

17 Q Okay.

18 A And myself.

19 Q With regard to determination on any action to take as
20 a result of your investigation, how does -- how does that
21 proceed? What I mean is: How does the investigation move from
22 being an internal affairs investigation to being a piece of
23 information provided to a decision maker with regard to forms
24 of punishment or employee -- or employment decisions and things
25 like that?

1 A Well, after we conclude our investigation, we provide
2 the sheriff, the colonel, or the chief our notes from the
3 interview -- a synopsis of that. And also there are times that
4 we may give a recommendation, but -- and oftentimes we just
5 give them the information and they will come up with whatever
6 sanction, if any.

7 Q And how -- how are the -- how is the investigation --
8 how are the documents for the investigation stored?

9 A In our file room.

10 Q Okay. Are they stored by paper or are they
11 electronically stored?

12 A Paper.

13 Q Okay. And how long are the -- how long are the
14 documents kept?

15 A They're kept through the employees -- to the end of
16 their employment. I believe it's -- the retention is maybe
17 seven years. I'm not sure. It's either five or seven years
18 until -- after they leave.

19 Q Okay. So if -- so if there's an investigation and
20 there's a punishment of some kind, that just stays in their
21 employment file?

22 A It will stay in their internal affairs file.

23 Q In their internal affairs file, okay.

24 A Correct.

25 Q How many -- and -- and it -- I don't -- I don't know

1 if you have to estimate or not, but how many use of force
2 investigations have been conducted and -- in the sheriff's
3 department in -- in your internal affairs unit in the last five
4 years?

5 A I -- I don't know, and I wouldn't be able to estimate
6 that.

7 Q Okay. I mean more than -- more than ten?

8 A I -- I -- I don't know.

9 Q Okay, okay. How would you be able to find the answer
10 to that question?

11 A I would have to do a search to find that answer.

12 Q What kind of -- what kind of search? How would the
13 search happen?

14 A I would either do it through logs or through the file
15 room.

16 Q Okay. So, I mean, literally going through paper, or
17 is there any kind of electronic stored information that can be
18 searched?

19 A We do have a log -- have to be searched -- but also,
20 like I said, through -- to double check the --

21 Q Okay. You broke up just a little bit there, so I'm
22 gonna kind of try --

23 A Okay.

24 Q -- to paraphrase what you said and -- and -- and --
25 and -- and see if that's what you said, because I'm not

1 completely sure. Did you say that -- that there is a log that
2 you can search that -- that would be electronic, but then you
3 would also go through paper files in a file room?

4 A Yes, to verify the log --

5 Q Okay.

6 A -- and the files are in sync.

7 Q Okay. How many investigations have there been in the
8 last five years into a deputy's inappropriate sexual contact
9 with a person?

10 A I don't know that answer either. I would have to go
11 through the same process.

12 Q Okay. Is -- is that something where there's a bunch
13 of them or just not very many, in your experience?

14 A It's -- well, it's something that I wouldn't feel
15 comfortable giving an estimated answer without verifying that.

16 Q Okay, okay. Who makes the determination on the
17 punishment or the employment termination or other actions taken
18 based on an internal affairs investigation? Who -- who are
19 the -- the people who decide what to do with the information
20 from the investigation?

21 A That would be either the sheriff, the colonel, or the
22 chief.

23 Q All right. Is it -- is it typically one person, or
24 is there a board or a committee?

25 A The sheriff would get -- is usually the final person

1 to sign off on any recommendations given by the previous --
2 from -- from the command staff -- or from the ranks, because it
3 goes up the chain of command.

4 Q Okay. And explained to me what you mean by the
5 recommendation from the command staff.

6 A So say we conducted an internal affairs investigation
7 and we provided -- we would provide whoever that next person --
8 like their supervisor, we would provide them the information,
9 and they would look at the -- either the recommendation, if we
10 gave it, or if we didn't, they would make a recommendation and,
11 you know, it would go up the chain from there. So say it was a
12 lieutenant, and then it would go to the next person. That
13 would be the captain, and it goes from there. So that's what I
14 mean by the chain of command. So they would have their
15 decision to agree or disagree with whatever decision that was
16 made -- or recommendation that was made.

17 Q Okay, understood. And then -- and then it eventually
18 would get to the sheriff who is the ultimate arbiter of the --
19 of the decision?

20 A Yes.

21 Q Okay. So if you read that someone -- so -- so if --
22 if -- so if someone -- and I don't mean if you read -- but
23 if -- but if someone has been suspended, that means that the --
24 that their -- that their supervisor, and then from their
25 supervisor on up all the way to the sheriff, has looked at the

1 file and the investigation that internal affairs made and made
2 a recommendation. And then when it got to the sheriff, the
3 sheriff made the ultimate decision to suspend or not suspend an
4 employee?

5 A Correct.

6 Q Okay. And I -- and forgive me because I don't
7 know -- but what is the hierarchy of the -- of the Richmond
8 County Sheriff's Department? What are the -- what are the
9 offices from sheriff all the way down to, you know, the --
10 the -- whoever is, you know, the bottom of the totem pole, so
11 to speak?

12 A So -- so it would depend on the division here at the
13 sheriff's office. Like if you want to just do like generals,
14 we would have the deputy, then a corporal -- sorry, I couldn't
15 remember -- deputy, corporal, sergeant, and then it's the
16 lieutenant, and then the captain, and then, like I said, it
17 would go to chief deputy, and then -- all -- it -- and, again,
18 it depends on the division too, because some don't have what --
19 that one does have. But then it would be the colonel, chief
20 and the sheriff.

21 Q Okay. And --

22 A Depending on the division.

23 Q Understood. I understand, you gave me just kind of a
24 general structure.

25 A Yes.

1 Q Okay. So the direct supervisor of a deputy is --
2 is -- is -- what's their title?

3 A It would be a colonel -- I mean -- I'm sorry, a
4 corporal.

5 Q Okay. And then a -- and a direct supervisor over a
6 corporal will be a sergeant?

7 A Yes.

8 Q Okay. And then is the lieutenant's a direct
9 supervisor over a sergeant?

10 A Yes.

11 Q Okay. And then that's when you kind of start to get,
12 depending on divisions?

13 A Yes.

14 Q Okay, okay. I just wanted to make sure that I
15 understood the structure. With regard to things like --
16 like -- like doing a private security and special duty, does
17 that have -- does that go through internal affairs, or is that
18 done at the hierarchical level?

19 A That's not done through internal affairs.

20 Q Okay, okay. What does internal affairs do besides
21 investigate employee conduct?

22 A We also are in charge of the public information
23 office. Also open records requests and complaints and pretty
24 much record restrictions, you know, so that also goes through
25 us too. And other duties, it just depends, but those are

1 basically our duties.

2 Q Okay.

3 A It can be outside of that, but those are what we
4 basically do.

5 Q Okay. How many internal investigation --
6 investigations have there been into the conduct of Charlie
7 Walker?

8 A I believe -- I'm familiar with at least two.

9 Q Okay. And what two are you familiar with?

10 A I'm familiar with this current one, and then I'm
11 familiar with the one prior to this one, in 2017.

12 Q Okay. And we'll talk about that one in a -- in a
13 minute. Is that -- that's the -- that's the use of -- that's
14 the use of force with a gentleman on a bicycle?

15 A Yes. I was not down here at that time, so I'm not --
16 I'm aware of it. But as in details of that one, I'm -- I don't
17 have the details on that one --

18 Q Okay, okay.

19 A -- because I wasn't involved in that investigation.

20 Q Understood. When did the -- you say the current one,
21 is there an open investigation, or is -- or is the internal
22 affairs matter with regard to the -- and I'm assuming out of
23 the -- my client's allegations, is the internal affairs matter
24 closed or is it ongoing?

25 A Oh, when I said the current one, I was talking about

1 the one we're here today -- with the Roundtree versus Colon.

2 That's the one I was referring and that one is closed.

3 Q Okay. When did that investigation begin?

4 A That began June the 18th or 19th.

5 Q Okay.

6 A The internal affairs investigation began on the 19th.

7 Q Okay. And what did -- what -- what was the process
8 of the internal affairs investigation? And when you say the
9 18th and the 19th, you're talking about June 18th and 19th --

10 A Yes.

11 Q -- 2019?

12 A Nineteen, yes.

13 Q Okay, okay. What was -- what did the internal
14 affairs office do as a part of that investigation?

15 A We interviewed Deputy Walker.

16 Q Okay. Did you interview anyone else?

17 A No.

18 Q Okay. What documents did y'all review?

19 A The incident report and also an activity report.

20 Q What's an activity report?

21 A It's a report that a deputy or an investigator will
22 do just to show what actions they did on a particular case.

23 Q Okay. And who's -- who's activity report did you
24 review?

25 A I believe it was Deputy -- or Investigator Syria. I

1 believe that was her name. I would have to -- I would have to
2 confirm the -- that investigator.

3 Q Okay. And what was that -- what was the activity
4 report -- what was the -- what was in that activity report?

5 A When Ms. Colon went to the hospital, Richmond County
6 Deputy's Office -- Richmond County Sheriff's Office was called
7 there, and the investigator spoke with her at the hospital.

8 Q Okay. So you mean -- you mean you read the report
9 created at the -- the medical center when -- when they called
10 the -- the sheriff's department as a result of her going in
11 there for a rape kit?

12 A Yes.

13 Q Okay.

14 A I reviewed the -- I reviewed the investigator's
15 notes, which it's labeled as an activity report. In our system
16 it's called an activity report.

17 Q Understand, understand. Did you -- did you interview
18 any -- anybody from the Georgia Bureau of Investigation.

19 A No.

20 Q Okay. Did you interview Ms. Colon?

21 A No.

22 Q Okay. Other than interviewing Deputy Walker and
23 reviewing the activity file, were there any other documents
24 reviewed or people interviewed?

25 A No.

1 Q Okay. Was there any punishment recommended as a
2 result of -- of the allegations from June of 2019?

3 A Yes.

4 Q Okay. What was that?

5 A A year of probation, ten days suspension, no special
6 duty assignments until the criminal investigation was complete,
7 and also a class on ethics and professionalism.

8 Q Okay, so a year of probation. A ten day suspension?

9 A Yes.

10 Q Okay. Was that with pay or without pay?

11 A It would be without pay.

12 Q And what else after that? You said a year probation,
13 a ten day suspension, and what else?

14 A No special duty assignments until the completion of
15 the criminal case and --

16 Q What's a special duty assignment?

17 A A special duty assignment is any assignment outside
18 of your regular duty, that you are representing the sheriff's
19 office and getting paid for.

20 Q Okay. Does the -- do those things have to -- do
21 special duty assignments have to run through the sheriff's
22 department? Do they have to be approved?

23 A They do.

24 Q Is working security at a -- at a function like the
25 one at Julian Smith Casino in June of 2019, is that a special

1 duty assignment?

2 A Yeah, that would have been a special duty assignment.

3 Q Is there any kind of security that a -- that a
4 sheriff's deputy would be allowed to work in their own time
5 that -- that wouldn't have to be approved by the -- by the
6 sheriff's department?

7 A No.

8 Q Okay. How are the special duty assignments approved?

9 A They will go through the specialty sergeant. That
10 request would go through them if there's something posted or a
11 need for a special duty officer. And that sergeant will
12 approve or deny that request.

13 Q Gotcha, okay. All right, you mentioned -- so we --
14 you provided -- subject to our open records request, you
15 provided a file to us that was -- that was titled Deputy
16 Walker's complete personnel file and disciplinary history.

17 A Yes.

18 Q You sent it by email. In that document, would the --
19 any of the actions taken as a result -- would any of the
20 actions taken as a result of the 2017 or 2019 internal affairs
21 investigations be reflected in that document?

22 A If it was an open investigation, it would not be
23 reflected in that. But if it -- if there was a closed
24 investigation, then, yes.

25 Q Okay. And how would -- how is it reflected in a

1 personnel file? How is the internal affairs investigation
2 reflected in the personnel file?

3 A It's not. It's a separate file.

4 Q Okay, all right. Because I would -- I've looked
5 through this thing a bunch of times and I have yet -- I'd --
6 have not seen any -- and I'm gonna share my screen to show you.

7 A Okay.

8 Q This is Exhibit C to your deposition.

9 (Whereupon, Plaintiff's Exhibit C was marked for
10 identification.)

11 BY MR. CAUTHORN: (Resuming)

12 Q I -- I looked through this -- this document, it's 154
13 pages, and I have not -- I didn't see any documentation of any
14 kind about any internal affairs investigations at all. And --
15 and -- and it's my understanding that I wouldn't expect to; is
16 that right?

17 A It would depend on the open records request. So if
18 the open records request was for the personnel file, then we
19 would provide their personnel file, which is what your Exhibit
20 is.

21 Q Gotcha, okay, okay. And it's my understanding that
22 Mr. Walker received -- even while he was being -- while he was
23 suspended in 2017 -- actually received good marks and received
24 a promotion -- a pay raise; is that right?

25 A I wouldn't be familiar with that. I don't do the

1 evaluations or raises.

2 Q Okay, okay. Are you aware that -- that -- if --
3 whether anybody recommended after the 2017 event that
4 Mr. Walker be terminated?

5 A I'm not sure. It would be reflected on his
6 disciplinary.

7 Q Okay. And where could I get a copy of the
8 disciplinary -- of -- of that information? Because it's not
9 included in this document, and this was the document that we
10 received from the open records -- how -- how would I send a
11 request to you in order to get the information regarding his
12 suspension and his internal affairs investigation history?

13 A That would be a request for his internal affairs
14 file.

15 Q Okay. All right, just let me see if I can share with
16 you here. Let's see, okay. This is a letter -- this is gonna
17 be Exhibit H.

18 (Whereupon, Plaintiff's Exhibit H was marked for
19 identification.)

20 BY MR. CAUTHORN: (Resuming)

21 Q And this is a letter from you to me in response to a
22 request that we made that is -- that was all -- for all records
23 reflecting any internal affairs investigation regarding Deputy
24 Charlie Walker.

25 A Uh-huh (affirmative).

1 Q And this is from March of 2021 and it -- it -- in it
2 you state that you had already transmitted that information to
3 my office. Do recall how you transmitted that information to
4 my office? Because I have not been able to locate it, and I --
5 and I -- and I --

6 A Go ahead, I'm sorry.

7 Q And I'm -- and I'm -- if it's provided -- been
8 provided, I don't wanna -- I'm not trying to make -- I just
9 haven't seen it. And so that's why I am asking: How did you
10 provide that information to my office?

11 A It would have been able to be sent through -- through
12 the email, like I did that one.

13 Q Okay. This is the -- this was the -- I'm gonna show
14 you this while I -- while we're here. This is the -- a letter
15 from you from March of 2020, and this is where you transmitted
16 the complete personnel file and disciplinary history.

17 A Uh-huh (affirmative).

18 Q This is Exhibit G -- will be Exhibit H (sic) to your
19 deposition.

20 (Whereupon, Plaintiff's Exhibit G was marked for
21 identification.)

22 BY MR. CAUTHORN: (Resuming)

23 Q This is the only transmission that I've gotten other
24 than some -- some other employment things. I think I'm gonna
25 probably need the -- the -- the internal affairs file for our

1 record, because we -- we haven't -- we have not received that
2 yet, okay?

3 A Okay.

4 Q Okay. I want -- and I wanted to ask you about some
5 things that might be in his internal affairs file, okay?

6 A Okay.

7 Q So I'm gonna see if I can -- I can share a screen.
8 This is Exhibit B. We're gonna share Exhibit B.

9 (Whereupon, Plaintiff's Exhibit B was marked for
10 identification.)

11 BY MR. CAUTHORN: (Resuming)

12 Q This is a newspaper -- or this is a news article that
13 I found when I Googled Charlie Walker. It's -- and it's how I
14 found out about the 2017 incident.

15 A Uh-huh (affirmative).

16 Q And in the article it said that -- that Mr. Walker
17 turned -- was in trouble for turning off of his -- his -- his
18 body camera during an encounter with a man that -- that was hit
19 with a baton and was not arrested, who was dropped off at a
20 park along with his bike that eventually went missing. My
21 understanding is that he was suspended -- well, I don't wanna
22 deal with my understanding -- what was his punishment for this?

23 A He was -- and I don't know -- like I said, I wasn't
24 involved with that internal affairs investigation. But to my
25 knowledge, he was suspended, he had to write a paper, and I

1 can't remember if there is anything else to that. But those
2 were the two that I do remember. I believe he may have been
3 also put on probation.

4 Q Okay. And forgive me -- what -- what level of
5 punishment does there have to be in order for -- for the Peace
6 Officer Standards -- the POST people to get involved in an
7 investigation into the license?

8 A Can you ask that one more time, I'm sorry?

9 Q Sure. What level of punishment does there have to be
10 given out at the -- at the sheriff's office in order for an
11 incident to be investigated by the P-O-S-T organization that
12 does the licensing for police officers?

13 A It would have to be demotion, termination is another
14 one, and -- I can't remember the -- if there was anything else,
15 but I do know demotions, terminations do have to go through
16 POST -- we do submit to POST.

17 Q In your -- in your experience at the -- at the
18 sheriff's department, how many internal affairs investigations
19 have led to a punishment that resulted in a POST investigation?

20 A I -- again, I couldn't answer -- I wouldn't be able
21 to answer that one --

22 Q Have there been any?

23 A -- so I don't know. There have been, yes.

24 Q Okay, okay. I'm gonna show you Exhibit F.

25 (Whereupon, Plaintiff's Exhibit F was marked for

1 identification.)

2 BY MR. CAUTHORN: (Resuming)

3 Q This is another investigation -- this is another
4 report from the internet from Googling Charlie Walker that
5 brings up this 2017 incident. And I'm gonna ask you a question
6 about a fact that's inserted in this. Because I don't know --
7 you know, I don't know if the newspaper is correct or not -- or
8 if the news is correct, so I'm gonna ask you if it's correct.

9 This -- this article alleges that the 2017 incident was
10 not the first incident where Charlie Walker turned off his body
11 camera in violation of department policy. Are you aware of
12 other times that Charlie Walker turned off his camera in
13 violation of department policy?

14 A I am not personally aware of any other ones. I'm not
15 saying that there aren't. I'm not aware of the others.

16 Q Okay. Would there be any internal affairs
17 investigations associated with something like that, with --
18 with turning off your --

19 A Yes. That would be in the internal affairs file.

20 Q Okay. And then it looks like it was -- I'm gonna
21 read from the article. This is the second page of the article.

22 A Richmond County lieutenant recommended seven days
23 suspension and reimbursing the man's stolen bicycle and phone,
24 but six other higher-ups have to sign off on it.

25 What does that mean that six other higher-ups --

1 higher-ups have to sign off on the recommendation?

2 A That would be the same thing that I described when I
3 told you about the hierarchy and who would have to -- who looks
4 at it and who signs off on it. And that would also depend on
5 the type of investigation.

6 Q Okay, okay.

7 A So that's what I previously explained.

8 Q Okay, I understand. And then this said the two other
9 -- two higher-ups didn't sign off on it, and that one
10 recommended twelve months of probation and the other one
11 recommended -- suggested terminating Deputy Walker. Is that --
12 would that be reflected in his internal affairs file?

13 A It would.

14 Q Okay. I'm -- so I -- so if -- so if we looked at his
15 internal affairs file, we would expect to see that the
16 individual higher-ups reviewed and then either rejected or made
17 their own recommendations for punishment?

18 A Correct.

19 Q Okay. This also says that Georgia POST cannot
20 investigate if -- unless there is a -- and I believe you said
21 that termination and demotion -- right, that's firing or
22 demoting -- but it also says if they suspend a deputy for
23 at least 30 days, then POST investigates. Is that what your
24 understanding is?

25 A I'm not sure about the 30 days.

1 Q Okay.

2 A Without -- but that would be easy to find on POST's
3 website.

4 Q Sure. And I'm -- and I'm asking -- I'm asking you
5 because you're right here and I --

6 A Yes.

7 Q -- I don't -- I -- I am not taking the Exhibit as --
8 at face value. That's why I wanted to kind of ask you, to make
9 sure that -- that - that -- to -- you know, there are things in
10 here that are alleged that might -- may or may not be in his
11 internal affairs file, and that's why I wanted to ask you if --

12 A I understand.

13 Q -- expect them to be in there. Okay. Have you seen
14 the video of -- of Deputy Walker's encounter of the man on the
15 bicycle?

16 A No.

17 Q Okay. I'm gonna show you Exhibit A. And this is --
18 let me see -- I'm gonna see if we can share this screen. Okay,
19 let's see if this works.

20 (Whereupon, Plaintiff's Exhibit A was marked for
21 identification.)

22 BY MR. CAUTHORN: (Resuming)

23 Q Can you see this -- the -- the YouTube?

24 A I see it now.

25 Q Okay. And I made it larger, so hopefully -- can you

1 see that?

2 A I can.

3 Q Okay, I'm just gonna let it play. And then I'm gonna
4 ask you a couple questions about it, okay?

5 A Okay.

6 (Whereupon, Mr. Cauthorn plays video/audio
7 recording.)

8 BY MS. HAYNES: (Resuming)

9 A Is yours playing through, or is it pretty skippy?

10 Q Mine's playing through smoothly. Are you skipping on
11 yours?

12 A Yes. If I -- it's looking like it's frames of video
13 instead of -- like I can hear some audio, but it looks like
14 it -- it's frames of video, if that makes sense.

15 Q Yeah. And that's kind of actually how your -- how
16 your picture is coming through the Zoom call right now.

17 A Okay.

18 Q Why don't you see if you can kill your camera real
19 quick --

20 A Okay.

21 Q -- and see if that helps with -- with the -- with
22 your ability to see --

23 A -- it --

24 Q Yeah.

25 A Okay.

1 Q And if -- and if -- and if it doesn't --

2 A -- try to --

3 Q -- let me know, okay?

4 A Okay.

5 Q Okay. Everything I'm gonna ask you about this is
6 pretty much -- hasn't happened yet, so we're -- I'm gonna back
7 it up to a minute twenty-seven and hit play from there, okay?

8 A Okay.

9 Q And you tell me if it's still choppy.

10 (Whereupon, Mr. Cauthorn plays video/audio
11 recording.)

12 BY MS. HAYNES: (Resuming)

13 A It is still choppy. Like the audio is not choppy,
14 but the video is.

15 Q Okay. For the record, I'm gonna let it play through.

16 A Okay.

17 Q And I want you to listen as much as watch, okay?

18 A Okay.

19 Q Because I want you to listen to what -- what the
20 communications are between the deputies as much as I want you
21 to watch the content of the video.

22 A Okay.

23 (Whereupon, Mr. Cauthorn plays video/audio
24 recording.)

25 BY MR. CAUTHORN: (Resuming)

1 Q All right. It ended. Did you hear that very -- the
2 part right at the end right before he turned off his -- his --
3 his -- his recording devices?

4 A Vaguely.

5 Q Okay. I want you to listen and see if you can hear
6 him say -- it sounds like he says something about the county
7 line and -- when he turns off his recording device. Turn it up
8 as loud as you can so that you can -- so that you can hear.

9 (Whereupon, Mr. Cauthorn plays video/audio
10 recording.)

11 BY MR. CAUTHORN: (Resuming)

12 Q It -- it sounded like he said something about dumping
13 something at the county line. Did -- does -- did that -- did
14 you hear that?

15 A I heard something. I can't say that that's what I
16 heard.

17 (Whereupon, Mr. Cauthorn plays video/audio
18 recording.)

19 BY MR. CAUTHORN: (Resuming)

20 Q All right. Now, just -- and you can -- you can -- if
21 you don't mind turning your -- your -- back on. I just got a
22 couple questions about --

23 (Whereupon, a brief interruption ensued.)

24 BY MR. CAUTHORN: (Resuming)

25 Q That -- oh, you know, I bet that's my YouTube. That

1 would be my YouTube because of the -- because it went to the
2 next video. There we go, okay.

3 So the -- the -- the question is: What -- what is the --
4 the policy on turning off the -- the body cameras?

5 A The body cameras are to be turned off at the end of
6 the call.

7 Q Okay. So when they're done with the -- the
8 individual who they would be interacting with?

9 A Yes. When they've completed the call.

10 Q Okay, so that -- in that video when they're starting
11 to talk about what they're gonna do, the video is turned off.
12 And that -- that would be the body camera violation that was
13 mentioned in the news article?

14 A If that's what it was. I -- I don't know if that
15 is -- that's just one video, so.

16 Q Okay. And do you -- do you know where Hyde Park is?

17 A I am -- I don't know it's exact location.

18 (Whereupon, a brief interruption ensued.)

19 MS. HAYNES: Randy, you're not on mute. Randy,
20 you're not on mute.

21 MR. CAUTHORN: Jennifer, let's go off the record.

22 MR. FRAILS: I apologize, I thought I was on mute.

23 MR. CAUTHORN: That's -- that -- I -- I was just
24 making sure we went off the record there. Okay, we -- we
25 can go back on.

1 THE VIDEOGRAPHER: We're still on the record.

2 MR. CAUTHORN: Okay.

3 THE VIDEOGRAPHER: I didn't actually go off the
4 record, so we're still on the record at 2:52.

5 BY MR. CAUTHORN: (Resuming)

6 Q Okay. Sergeant Lee, I'd asked you if you knew where
7 Hyde Park is?

8 A Vaguely. I've never been there --

9 Q Okay.

10 A -- but I know it's in Richmond County.

11 Q It is in Richmond County.

12 A Yes.

13 Q It's my understanding that's where they found that
14 man -- and they never found his bicycle -- was in Hyde Park.
15 Is -- is that what your understanding is from the internal
16 affairs file?

17 A Again, I'm familiar with it, but I don't know the
18 details of the case. I know that there was a bicycle that was
19 missing and they had to pay restitution.

20 Q Okay. I'm gonna show you another Exhibit. This was
21 provided to me by you. This is Charlie T. Walker's work
22 schedule for the month of June of 2019.

23 (Whereupon, Plaintiff's Exhibit D was marked for
24 identification.)

25 BY MR. CAUTHORN: (Resuming)

1 Q Now, correct me if I'm wrong, but it says right here,
2 June 14th, that he was not working. That he used vacation
3 time; is that right?

4 A Yes.

5 Q Okay. Does that mean that he got paid -- is that
6 paid vacation time that he got that day?

7 A If he had vacation to -- if he had vacation hours,
8 yes.

9 Q Okay. And then he -- he used vacation the following
10 day on June 15th of 2019. Is that the correct
11 interpretation?

12 A Yes, that's my understanding.

13 Q Okay. And then he used vacation time on Sunday the
14 16th as well. Is that a correct interpretation?

15 A That's my understanding.

16 Q Okay. And that's Exhibit D to your deposition. And
17 then I'm gonna show -- go ahead and show you Exhibit E.

18 (Whereupon, Plaintiff's Exhibit E was marked for
19 identification.)

20 BY MR. CAUTHORN: (Resuming)

21 Q And this is a letter from you, and it is a list of
22 all of the approved off duty private security requests made by
23 Deputy Charlie Walker during his period of employment with the
24 sheriff's department. And there were no requests for any 25
25 Gents events -- that could have been inartfully requested --

1 but here -- here's a list of his special duty assignments in
2 2019. It looks -- appears he had approval for one in January
3 26th of 2019, one in October 5th of 2019, and one November
4 23rd of 2019. Is this a complete list of the special duty
5 assignments that were approved for Mr. Walker in -- or Deputy
6 Walker in 2019?

7 A That I received, yes.

8 Q Okay. The reason being is because the -- the
9 security detail at the event on June 14th, 2019 was described
10 as a special duty assignment.

11 A When I received your request, I reached out to the
12 special duty sergeant and that is the information that I
13 received.

14 Q Okay. So would that indicate to you that he had not
15 been approved for special duty for June 14th of 2019?

16 A It was either that he was not approved or the request
17 did not come in for the special duty sergeant to note.

18 Q Okay. What is the process for special duty approval?

19 A It's a -- they receive a written approval by the
20 special duty sergeant. They would have to submit their
21 request, and then the special duty sergeant would approve that
22 or not.

23 Q And do all requests have to go through the special
24 duty sergeant?

25 A They're supposed to, yes.

1 Q Okay. And when you say they're supposed to, what do
2 you -- what do you mean by that?

3 A That all requests are just supposed to go through the
4 special duty sergeant.

5 Q Okay. And according to the information you received
6 from the special duty sergeant, there was no request for
7 special duty or approval of special duty for June 14th of 2019
8 for Charlie Walker?

9 A Correct.

10 Q Okay. The -- the district attorney's file for
11 Charlie Walker mentions that he took a lie detector test. Do
12 you know who administered the lie detector test to Charlie
13 Walker?

14 A That would be through the GBI.

15 Q Okay. Do you know if that occurred at the sheriff's
16 department or if it occurred at a GBI office?

17 A I don't know.

18 Q Okay. Did you know that Charlie Walker had condoms
19 in his car on the night of the -- June 14th, 2020 (sic)?

20 A Yes.

21 Q Okay. Is it appropriate for a deputy to carry
22 condoms to a -- to a job?

23 MR. FRAILS: I object to the form of the question.

24 BY MR. CAUTHORN: (Resuming)

25 Q You can answer the question, Miss -- Sergeant Lee.

1 A I -- I can't answer that question. I -- I don't have
2 an answer to that question. That would be something that an
3 individual deputy would decide to bring on their own.

4 Q Is there a department policy about sexual intercourse
5 or sexual activity while in uniform for the sheriff's
6 department?

7 A That would fall under manner of conduct or conduct
8 unbecoming.

9 Q Okay. What I mean -- what I mean is that is there
10 a -- is there a -- is there a department policy that says
11 whether it's appropriate for a sheriff's deputy to engage in
12 sexual activity while in uniform?

13 A There is a policy. It's about public displays of
14 affection while in uniform.

15 Q Okay. Let me -- let's take a break for about 10
16 minutes -- comfort break -- and we'll come back and I will --
17 and I will do my best to -- to begin wrapping up, okay,
18 Sergeant Lee?

19 A Okay.

20 THE VIDEOGRAPHER: We are off the record at 3:00.

21 (Whereupon, a brief recess ensued.)

22 THE VIDEOGRAPHER: And we are back on the record at
23 5:07.

24 MR. CAUTHORN: 3:07.

25 THE VIDEOGRAPHER: Sorry, 3:07.

1 BY MR. CAUTHORN: (Resuming)

2 Q Sergeant Lee, what was the -- the official
3 determination that led to the -- the punishment of
4 Deputy Walker arising out of this incident? For -- for
5 instance, what I mean is -- is, what did -- what was the
6 determination of -- of what violation did he have to get
7 punished -- to get a year probation and a ten day suspension
8 and no special duty?

9 A We looked at the policy on conduct unbecoming and we
10 substantiated that based on the investigation.

11 Q Okay, so it's the -- the departmental policy of
12 conduct unbecoming of an officer?

13 A Yes.

14 Q Did anyone recommend that he be fired as a result of
15 this?

16 A No.

17 Q Okay. Did anyone recommend that he be suspended for
18 30 days or more as a result of this?

19 A No.

20 Q Okay. Did anyone recommend that he be demoted as a
21 result of this?

22 A No.

23 Q Okay. Do -- do you have any relationship with the
24 organization known as 25 Gents Inc.?

25 A No.

1 Q Okay. Do you know what that is?

2 A No.

3 Q Okay. Who would -- who would have been the internal
4 affairs person who investigated the 2017 incident and any
5 previous incidents before that with Deputy Walker?

6 A I'm not sure who that investigator was. I would have
7 to look at that file.

8 Q Okay. I just mean -- what I'm saying is I know it's
9 before you got there and, you know, I know that you don't have
10 any personal --

11 A Uh-huh (affirmative).

12 Q -- knowledge of it. Is there anybody who is
13 currently in the internal affairs department that would have
14 had personal knowledge of -- of that investigation in 2017?

15 A Yes, Lieutenant Rahn.

16 Q R-A-H-N?

17 A Lieutenant -- yes.

18 Q Okay, okay. Who is in charge of internal affairs at
19 the Richmond County Sheriff's Department?

20 A We directly report to the sheriff.

21 Q Okay. I -- I guess what I mean is who -- is your --
22 is your direct supervisor the sheriff himself?

23 A My direct supervisor would be Lieutenant Rahn.

24 Q Okay. And then immediately above your department all
25 goes straight to the sheriff?

1 A So -- and -- it would be -- Captain Rollins is our
2 captain. He's over Lieutenant Rahn.

3 Q Okay. Anybody above the captain?

4 A It would be then Colonel Chew, Chief Deputy Clayton,
5 and then the sheriff.

6 Q Okay, okay. I do -- I do -- I am serious when I say
7 thank you for your -- your help. You have -- I do believe
8 that, you know, when you were responding to our open records
9 request, that it was an -- less than ideal world that we were
10 in with regard to Covid and things like that. And I know
11 that -- and I know that you had responsibilities that weren't
12 easy to fulfill, so I appreciate that. And I don't have any
13 more questions for you other than maybe some follow up if
14 Mr. Frails or Ms. Haynes have questions.

15 A Okay.

16 MR. FRAILS: Let me consult Ms. Haynes and we'll be
17 right back.

18 MR. CAUTHORN: Okay.

19 MR. FRAILS: We -- we don't have any follow-up
20 questions. Well, he's not there. We don't have any
21 follow-up questions.

22 MR. CAUTHORN: Okay. Well, do y'all wanna read and
23 sign or do you wanna waive?

24 MR. FRAILS: We'll waive.

25 MR. CAUTHORN: Okay. Thank you, Sergeant Lee, and

1 you have yourself a good weekend. Randy and Tameka, thank
2 you for your time today. Thanks for making everybody
3 available and -- and I guess I will see one, if not both
4 of you guys on Monday.

5 (Whereupon, the deposition concluded at approximately
6 3:15 p.m.)

C E R T I F I C A T E

STATE OF GEORGIA)

COUNTY OF FULTON)

I, JENNIFER A. GERBER, Certified Court Reporter in and for the State of Georgia, do hereby certify that the foregoing proceedings were taken down by me; that the foregoing proceedings were reduced to print by me; that the foregoing pages represent a true, correct, and complete transcript of the testimony given by the witness, who was first duly sworn by me; that I am not a relative, employee, attorney or counsel of any of the parties; that I am not a relative or employee of attorney or counsel for any of said parties; nor am I financially or otherwise interested in the outcome of the action.

This certification is expressly withdrawn and denied upon the disassembly, photocopying, reproduction of electronic copies, and/or distribution of the foregoing transcript, or any part thereof, including exhibits, unless said disassembly, photocopying, reproduction, and/or distribution is done by me and my signature and original seal is attached thereto.

I further certify that the original of said deposition shall be filed under seal with J. Wickliffe Cauthorn, Attorney at Law; The Cauthorn Firm, 201 Cherokee Street, Marietta, Georgia.

This, the 14th day of February, 2022.



JENNIFER A. GERBER

CERTIFIED COURT REPORTER # 6241-2465-4151-2704

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STATE OF GEORGIA)

COUNTY OF FULTON)

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JENNIFER A. GERBER

CERTIFIED COURT REPORTER # 6241-2465-4151-2704

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